

Illinois Statewide TRM Version 2.0: Comparison Exhibit of Non-Consensus Policy Items

		Position 1			Position 2		
#	Item Description	Position Statement	Rationale	Supporting Stakeholders	Position Statement	Rationale	Supporting Stakeholders
1	<p>TECHNICAL REFERENCE MANUAL: EFFECTIVE DATES</p> <p>Does the TRM cease to be effective on 5/31 every year?</p>	No	<ol style="list-style-type: none"> 1. ICC Orders generally remain in effect until the ICC modifies them at a future date, and do not cease to be effective each year unless re-adopted by the ICC. 2. In no other jurisdiction does the TRM cease to be effective each year unless it is re-adopted by the state regulatory commission. 3. Having the TRM cease to be effective each year will create unnecessary planning uncertainty and cost, particularly given that the ICC is unlikely be able to re-adopt the TRM each year by the date it expires. 4. The stakeholders who support this position did not intend to have the TRM cease to be effective each year unless the ICC re-adopted it. 	<p>Ameren IL ComEd Nicor PG/NSG DCEO NRDC ELPC CUB AG MEEA CNT Energy, U of I – Chicago - ERC</p>	Yes.	<p>Section V. (3) of the ICC Order approving the TRM states that the TRM is approved specifically for GPY1, GPY2, and EPY5, and Table 2.2 of the Policy Document supports this position by being specific on what Commission approved version of the TRM applies to which program year.</p>	Staff

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2	TECHNICAL REFERENCE MANUAL: REMOVING MEASURES Should existing measures in TRM 1.0 be removed entirely from TRM 2.0 if there is a disagreement over any subcomponent of the measure during the update to TRM 2.0?	No.	<p>The previously approved version of the measure in TRM 1.0 continues to be included in TRM 2.0 until the ICC rules on the revised measure as it is displayed in the Comparison Exhibit in a separate filing.</p> <p>The intent of the TRM is to provide a degree of certainty, and subjecting all measures to an annual consensus requirement undercuts the purpose of a TRM.</p>	Ameren IL ComEd Nicor PG/NSG DCEO NRDC ELPC CUB AG MEEA CNT Energy, U of I – Chicago - ERC	<u>Yes.</u>	<p>If any component of a measure in TRM 1.0 is in dispute, then the entire measure must be removed from TRM 2.0 until the ICC rules on the revised measure as it is displayed in the Comparison Exhibit in a separate filing.</p> <p>Consistent with Issue #1, the ICC must approve the entire TRM annually, and the Policy Document states that non-consensus issues must be filed separately from the consensus TRM.</p>	Staff
3	TEHCNICAL REFERENCE MANUAL: RETROSPECTIVE VS. PROSPECTIVE APPLICATION OF NONCONSENSUS MEASURES Should measure level non-consensus issues that are resolved by the ICC be applied retrospectively to the beginning of the current PY?	No. The approved and revised measure would apply prospectively to the existing program year from the date of the ICC Order forward plus a Grace Period of 60 days or the end of the current program year, whichever comes first. In exceptional cases where the measure is 'high-impact' and the ability of the Program Administrator to get out of the market within 60 days is unrealistic, the PA may petition the ICC for a longer grace period. In addition,	Changing the calculation of savings claims in the middle of a program year creates uncertainty which the TRM is meant to alleviate, and it is inconsistent with the NTG framework. Furthermore, this uncertainty creates a disincentive to continue promoting and implementing the program.	Ameren IL ComEd Nicor DCEO NRDC ELPC CUB AG MEEA CNT Energy, U of I – Chicago - ERC	Yes. The approved and revised measure would apply retrospectively to the beginning of the current program year.	The Program Administrators should not be promoting measures that are not cost effective or get credit toward their goals for energy savings that have been reduced by a Commission Order.	Staff

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		<p>measures that are in progress (“i.e. an end customer application in hand”) but not yet completed are / are not considered ‘at risk’ in terms of the savings claim.</p> <p><u>Alternate to Position 1:</u> No. The approved and revised measure would apply prospectively to the upcoming program year.</p>	<p>Very hard to disrupt programs in the middle of the year. Wait until the beginning of the next year to make any changes to minimize program disruption.</p>	PG/NSG			